MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR MANAGEMENT
and the Northern Regional Office

Dutch Mills
1901 East Kercher Road
Goshen, Indiana 46526

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, , 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-10529-00505	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and the Northern Regional Office (NRO). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a woodworking operation collocated with a surface coating operation.

Authorized Individual:	Mr. Pete Yoder
Source Address:	1901 East Kercher Road, Goshen, Indiana 46526
Mailing Address:	P.O. Box 805, Goshen, Indiana 46527-0805
Phone Number:	219-533-0388
SIC Code:	1751 and 2434
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

Surface Coating Operations

(1) Five (5) spray booths, identified as:
- (A) Spray booth1, consisting of one spray gun, identified as SG1, with a maximum capacity of 70.66 pounds of stain per hour, and exhausting to stack SB1X.
- (B) Spray booth2, consisting of two spray guns, identified as SG2 and SG3, with a maximum capacity of 141.32 pounds of primer per hour combined, and exhausting to stack SB2X.
- (C) Spray booth3, consisting of two spray guns, identified as SG4 and SG5, with a maximum capacity of 141.32 pounds of varnish per hour combined and exhausting to stack SB3X.
- (D) Spray booth4, consisting of one spray gun, identified as SG6, with a maximum capacity of 70.66 pounds of topcoat per hour, and exhausting to stack SB4X.
- (E) Spray booth5, consisting of one spray gun, identified as SG7, with a maximum capacity of 70.66 pounds of varnish per hour, and exhausting to stack SB5X.

(2) Ten (10) siphon cup guns, identified as SG8, SG9, SG10, SG11, SG12, SG13, SG14, SG15, SG16, and SG17, with a maximum capacity of 49.74 pounds per hour for each unit, and exhausting to stacks, SB1X, SB2X, SB3X, SB4X and SB5X.

Woodworking Operations

(1) One (1) Busellato CNC Mill, identified as CNC1, with a maximum capacity of 169.59 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(2) Seven (7) table saws, identified as:
- (A) Power-Matic 10" table saw, identified as Tsaw1, with a maximum capacity of 71.68 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (B) Delta 10" table saw, identified as Tsaw2, with a maximum capacity of 19.50 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (C) Delta 10" table saw, identified as Tsaw3, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (D) Delta 10" table saw, identified as Tsaw4, with a maximum capacity of 36.23 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (E) Delta table saw, identified as Tsaw5, with a maximum capacity of 7.21 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (F) One (1) Delta DWC table saw, identified as DWCTSaw1, with a maximum capacity of 3.60 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (G) One (1) EMA sliding table saw, identified as SlidTabSw1, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(3) Two (2) drill presses, identified as:
- (A) Delta drill press, identified as Dpress1, with a maximum capacity of 1.19 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (B) Delta drill press, identified as Dpress2, with a maximum capacity of 0.12 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(4) Seven (7) sanders, identified as:
- (A) One (1) Costa wide belt sander, identified as WBSand1, with a maximum capacity of 216.29 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (B) One (1) Haney orbital sander, identified as OrbSand1, with a maximum capacity of 216.29 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (C) One (1) Quickwood De-Neb sander, identified as DNebSand1, with a maximum capacity of 216.29 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (D) One (1) Whirlwind oscillator edge sander, identified as OscSand1, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (E) One (1) Progress edge sander, identified as EdgSand1, with a maximum capacity of 7.21 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (F) One (1) Progress float sander, identified as FloatSand1, with a maximum capacity of 3.60 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (G) One (1) Jet disc sander, identified as DiscSand1, with a maximum capacity of 1.80 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(5) Seven (7) shapers, identified as:

(A) One (1) Power-Matic shaper, identified as Shap1, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
(B) One (1) Power-Matic shaper, identified as Shap2, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
(C) One (1) EMA shaper, identified as Shap3, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
(D) One (1) Power-Matic shaper, identified as Shap4, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
(E) One (1) Delta shaper, identified as Shap5, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
(F) One (1) Delta shaper, identified as Shap6, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
(G) One (1) Mocar shaper, identified as Shap7, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(6) Two (2) Pin routers, identified as:
(A) One (1) EMA pin router, identified as PinR1, with a maximum capacity of 8.44 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
(B) One (1) Rockwell/SLM pin router, identified as PinR2, with a maximum capacity of 8.44 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(7) One (1) HER-SAF panel router, identified as PanelRout1, with a maximum capacity of 4.83 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(8) One (1) panel saw, identified as PanwlSw1, with a maximum capacity of 118.66 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(9) Three (3) chop saws, identified as ChopSw1, ChopSw2 and ChopSw3, with a maximum capacity of 252.34 pounds per hour for each unit, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(10) One (1) Dodds Dovetailer, identified as DvTail1, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(11) One (1) Balestrini single end tenoner, identified as SingTenoner1, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(12) One (1) Balestrini Mortising machine, identified as Mortising1, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(13) One (1) Voonwood shaper/sander, identified as ShapSand1, with a maximum capacity of 54.07 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(14) One (1) EMA planer, identified as Plane1, with a maximum capacity of 216.29 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(15) One (1) EMA shaper with a sliding table, identified as ShapSlid1, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(16) One (1) Dutch Mills double end tenoner, identified as DoubTenoner, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(17) One (1) Retter boring machine, identified as BorMach1, with a maximum capacity of 2.46 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(18) One (1) Watkin moulder, identified as Moulder1, with a maximum capacity of 270.36 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(19) One (1) OGM Gang-rip saw, identified as GangRipSw1, with a maximum capacity of 360.48 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(20) Three (3) miter saws, identified as:
- (a) One (1) DeWalt 12" miter saw, identified as MiterSw1, with a maximum capacity of 2.42 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (b) One (1) DeWalt 12" miter saw, identified as MiterSw2, with a maximum capacity of 3.60 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (c) One (1) Hitachi miter saw, identified as MiterSw3, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(21) Two (2) Groovers, identified as Groove1 and Groove2, with a maximum capacity of 7.21 pounds per hour for each unit, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(22) One (1) Delta Notcher, identified as Notch1, with a maximum capacity of 3.60 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(23) One (1) Power-Matic band saw, identified as BandSw1, with a maximum capacity of 1.80 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees)**.**

(b) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAM, and the NRO, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

C.2 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of [326 IAC 2-6.1-6] whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.3 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

C.4 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAM shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

C.5 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.6 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.7 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Pe4rmittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date. The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.10 Maintenance of Monitoring Equipment [IC 13-14-1-13]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour (this time frame is determined on a case by case basis) until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of

326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 Annual Emission Statement [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

C.16 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly. Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions unit Description Surface Coating Operations

(1) Five (5) spray booths, identified as:
(A) Spray booth1, consisting of one spray gun, identified as SG1, with a maximum capacity of 70.66 pounds per hour, and exhausting to stack SB1X.
(B) Spray booth2, consisting of two spray guns, identified as SG2 and SG3, with a maximum capacity of 141.32 pounds per hour combined, and exhausting to Stack SB2X.
(C) Spray booth3, consisting of two spray guns, identified as SG4 and SG5, with a maximum capacity of 141.32 pounds per hour combined and exhausting to stack SB3X.
(D) Spray booth4, consisting of one spray gun, identified as SG6, with a maximum capacity of 70.66 pounds per hour, and exhausting to stack SB4X.
(E) Spray booth5, consisting of one spray gun, identified as SG7, with a maximum capacity of 70.66 pounds per hour, and exhausting to stack SB5X.

(2) Ten (10) siphon cup guns, identified as SG8, SG9, SG10, SG11, SG12, SG13, SG14, SG15, SG16, and SG17, with a maximum capacity of 49.74 pounds per hour for each unit, and exhausting to stacks, SB1X, SB2X, SB3X, SB4X and SB5X.

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Volatile Organic Compounds (VOC)

Any change or modification which may increase the potential to emit to 100 tons per year or more of volatile organic compounds must be approved by the Office of Air Management before any such change may occur.

D.1.3 Hazardous Air Pollutants (HAPs)

Any change or modification which may increase the potential to emit of any single HAP to 10 tons per year or more and of any combination of HAPs to 25 tons per year or more, must be approved by the Office of Air Management before any such change may occur.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The particulate matter (PM) from the surface coating operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this emissions unit and any control devices.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the surface coating operations are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (SB1X, SB2X, SB3X, SB4X and SB5X) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions unit Description Woodworking Operations

(1) One (1) Busellato CNC Mill, identified as CNC1, with a maximum capacity of 169.59 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(2) Seven (7) table saws, identified as:
- (A) Power-Matic 10" table saw, identified as Tsaw1, with a maximum capacity of 71.68 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (B) Delta 10" table saw, identified as Tsaw2, with a maximum capacity of 19.50 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (C) Delta 10" table saw, identified as Tsaw3, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (D) Delta 10" table saw, identified as Tsaw4, with a maximum capacity of 36.23 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (E) Delta table saw, identified as Tsaw5, with a maximum capacity of 7.21 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (F) One (1) Delta DWC table saw, identified as DWCTSaw1, with a maximum capacity of 3.60 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (G) One (1) EMA sliding table saw, identified as SlidTabSw1, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(3) Two (2) drill presses, identified as:
- (A) Delta drill press, identified as Dpress1, with a maximum capacity of 1.19 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (B) Delta drill press, identified as Dpress2, with a maximum capacity of 0.12 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(4) Seven (7) sanders, identified as:
- (A) One (1) Costa wide belt sander, identified as WBSand1, with a maximum capacity of 216.29 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (B) One (1) Haney orbital sander, identified as OrbSand1, with a maximum capacity of 216.29 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (C) One (1) Quickwood De-Neb sander, identified as DNebSand1, with a maximum capacity of 216.29 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (D) One (1) Whirlwind oscillator edge sander, identified as OscSand1, with a

maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(E) One (1) Progress edge sander, identified as EdgSand1, with a maximum capacity of 7.21 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(F) One (1) Progress float sander, identified as FloatSand1, with a maximum capacity of 3.60 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(G) One (1) Jet disc sander, identified as DiscSand1, with a maximum capacity of 1.80 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(5) Seven (7) shapers, identified as:

(A) One (1) Power-Matic shaper, identified as Shap1, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(B) One (1) Power-Matic shaper, identified as Shap2, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(C) One (1) EMA shaper, identified as Shap3, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(D) One (1) Power-Matic shaper, identified as Shap4, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(E) One (1) Delta shaper, identified as Shap5, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(F) One (1) Delta shaper, identified as Shap6, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(G) One (1) Mocar shaper, identified as Shap7, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(6) Two (2) Pin routers, identified as:

(A) One (1) EMA pin router, identified as PinR1, with a maximum capacity of 8.44 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(B) One (1) Rockwell/SLM pin router, identified as PinR2, with a maximum capacity of 8.44 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(7) One (1) HER-SAF panel router, identified as PanelRout1, with a maximum capacity of 4.83 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(8) Three (3) chop saws, identified as ChopSw1, ChopSw2 and ChopSw3, with a maximum capacity of 252.34 pounds per hour for each unit, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(9) One (1) Dodds Dovetailer, identified as DvTail1, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(10) One (1) Balestrini single end tenoner, identified as SingTenoner1, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(11) One (1) Balestrini Mortising machine, identified as Mortising1, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(12) One (1) Voonwood shaper/sander, identified as ShapSand1, with a maximum capacity of 54.07 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(13) One (1) EMA planer, identified as Plane1, with a maximum capacity of 216.29 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(14) One (1) EMA shaper with a sliding table, identified as ShapSlid1, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(15) One (1) Dutch Mills double end tenoner, identified as DoubTenoner, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(16) One (1) Retter boring machine, identified as BorMach1, with a maximum capacity of 2.46 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(17) One (1) Watkin moulder, identified as Moulder1, with a maximum capacity of 270.36 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(18) One (1) OGM Gang-rip saw, identified as GangRipSw1, with a maximum capacity of 360.48 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(19) Three (3) miter saws, identified as:

(a) One (1) DeWalt 12" miter saw, identified as MiterSw1, with a maximum capacity of 2.42 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(b) One (1) DeWalt 12" miter saw, identified as MiterSw2, with a maximum capacity of 3.60 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(c) One (1) Hitachi miter saw, identified as MiterSw3, with a maximum capacity

matter emissions and exhausting to stack DCX1.

(c) One (1) Hitachi miter saw, identified as MiterSw3, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(20) Two (2) Groovers, identified as Groove1 and Groove2, with a maximum capacity of 7.21 pounds per hour for each unit, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(21) One (1) Delta Notcher, identified as Notch1, with a maximum capacity of 3.60 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(22) One (1) Power-Matic band saw, identified as BandSw1, with a maximum capacity of 1.80 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

Emission Limitations and Standards

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

The particulate matter (PM) from the woodworking operations shall be limited to 5.66 pounds per hour when operating at a process weight rate of 1.62 tons per hour.

This limit was calculated from the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this emissions unit and its control device.

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.4 Particulate Matter (PM)

The baghouse for PM control shall be in operation at all times when the woodworking operations are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.5 Visible Emissions Notations

(a) Daily visible emission notations of the baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhaust.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE: IT HAS POTENTIAL TO EMIT 25 LBS/HR PARTICULATES ?_____, 100 LBS/HR VOC ?_____, 100 LBS/HR SULFUR DIOXIDE ?_____ OR 2000 LBS/HR OF ANY OTHER POLLUTANT ?_____ EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____

LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____
_____
_____

MALFUNCTION REPORTED BY: _____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____DATE:_____TIME:_____

FAX NUMBER - 317 233-5967

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. The requirements of this rule (326 IAC 1-6) shall apply to the owner or operator of any facility which has the potential to emit twenty-five (25) pounds per hour of particulates, one hundred (100) pounds per hour of volatile organic compounds or SO2, or two thousand (2,000) pounds per hour of any other pollutant; or to the owner or operator of any facility with emission control equipment which suffers a malfunction that causes emissions in excess of the applicable limitation.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. (Air Pollution Control Board; 326 IAC 1-2-39; filed Mar 10, 1988, 1:20 p.m. : 11 IR 2373)

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Minor Source Operating Permit

Source Name: Dutch Mills
Source Location: 1901 East Kercher Road, Goshen, Indiana 46526
County: Elkhart
SIC Code: 1751 and 2434
Operation Permit No.: 039-10529-00505
Permit Reviewer: Kimberly Titzer

On April 10, 1999, the Office of Air Management (OAM) had a notice published in the Goshen News, Goshen, Indiana, stating that Dutch Mills had applied for a Part 70 Operating Permit to operate a woodworking operation collocated with a surface coating operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

(1) Section C.15 has been revised to include the address for submittal of the annual emission statement.

C.15 Annual Emission Statement [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the

date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(2) Section D.1.2 has been revised to correct the grammar of the condition.

D.1.2 Volatile Organic Compounds (VOC)

Any change or modification which may increase the potential to emit ~~of~~ **to** 100 tons per year or more of volatile organic compounds must be approved by the Office of Air Management before any such change may occur.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: Dutch Mills
Source Location: 1901 East Kercher Road, Goshen, Indiana 46526
County: Elkhart
SIC Code: 1751 and 2434
Operation Permit No.: 039-10529-00505
Permit Reviewer: Kimberly Titzer

The Office of Air Management (OAM) has reviewed an application from Dutch Mills relating to the construction and operation of a woodworking operation collocated with a surface coating operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Surface Coating Operations (all existing as of 1990)

(1) Five (5) spray booths, identified as:
  (A) Spray booth1, consisting of one spray gun, identified as SG1, with a maximum capacity of 70.66 pounds of stain per hour, and exhausting to stack SB1X.
  (B) Spray booth2, consisting of two spray guns, identified as SG2 and SG3, with a maximum capacity of 141.32 pounds of primer per hour combined, and exhausting to stack SB2X.
  (C) Spray booth3, consisting of two spray guns, identified as SG4 and SG5, with a maximum capacity of 141.32 pounds of varnish per hour combined and exhausting to stack SB3X.
  (D) Spray booth4, consisting of one spray gun, identified as SG6, with a maximum capacity of 70.66 pounds of topcoat per hour, and exhausting to stack SB4X.
  (E) Spray booth5, consisting of one spray gun, identified as SG7, with a maximum capacity of 70.66 pounds of varnish per hour, and exhausting to stack SB5X.

(2) Ten (10) siphon cup guns, identified as SG8, SG9, SG10, SG11, SG12, SG13, SG14, SG15, SG16, and SG17, with a maximum capacity of 49.74 pounds per hour for each unit, and exhausting to stacks, SB1X, SB2X, SB3X, SB4X and SB5X.

Woodworking Operations (all existing as of 1990)

(1) One (1) Busellato CNC Mill, identified as CNC1, with a maximum capacity of 169.59 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(2) Seven (7) table saws, identified as:
  (A) Power-Matic 10" table saw, identified as Tsaw1, with a maximum capacity of 71.68 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
  (B) Delta 10" table saw, identified as Tsaw2, with a maximum capacity of 19.50

pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(C) Delta 10" table saw, identified as Tsaw3, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(D) Delta 10" table saw, identified as Tsaw4, with a maximum capacity of 36.23 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(E) Delta table saw, identified as Tsaw5, with a maximum capacity of 7.21 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(F) One (1) Delta DWC table saw, identified as DWCTSaw1, with a maximum capacity of 3.60 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(G) One (1) EMA sliding table saw, identified as SlidTabSw1, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(3) Two (2) drill presses, identified as:

(A) Delta drill press, identified as Dpress1, with a maximum capacity of 1.19 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(B) Delta drill press, identified as Dpress2, with a maximum capacity of 0.12 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(4) Seven (7) sanders, identified as:

(A) One (1) Costa wide belt sander, identified as WBSand1, with a maximum capacity of 216.29 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(B) One (1) Haney orbital sander, identified as OrbSand1, with a maximum capacity of 216.29 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(C) One (1) Quickwood De-Neb sander, identified as DNebSand1, with a maximum capacity of 216.29 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(D) One (1) Whirlwind oscillator edge sander, identified as OscSand1, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(E) One (1) Progress edge sander, identified as EdgSand1, with a maximum capacity of 7.21 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(F) One (1) Progress float sander, identified as FloatSand1, with a maximum capacity of 3.60 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(G) One (1) Jet disc sander, identified as DiscSand1, with a maximum capacity of 1.80 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(5) Seven (7) shapers, identified as:

(A) One (1) Power-Matic shaper, identified as Shap1, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(B) One (1) Power-Matic shaper, identified as Shap2, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(C) One (1) EMA shaper, identified as Shap3, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter

emissions and exhausting to stack DCX1.

(D) One (1) Power-Matic shaper, identified as Shap4, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(E) One (1) Delta shaper, identified as Shap5, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(F) One (1) Delta shaper, identified as Shap6, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(G) One (1) Mocar shaper, identified as Shap7, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(6) Two (2) Pin routers, identified as:

(A) One (1) EMA pin router, identified as PinR1, with a maximum capacity of 8.44 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(B) One (1) Rockwell/SLM pin router, identified as PinR2, with a maximum capacity of 8.44 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(7) One (1) HER-SAF panel router, identified as PanelRout1, with a maximum capacity of 4.83 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(8) One (1) panel saw, identified as PanwlSw1, with a maximum capacity of 118.66 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(9) Three (3) chop saws, identified as ChopSw1, ChopSw2 and ChopSw3, with a maximum capacity of 252.34 pounds per hour for each unit, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(10) One (1) Dodds Dovetailer, identified as DvTail1, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(11) One (1) Balestrini single end tenoner, identified as SingTenoner1, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(12) One (1) Balestrini Mortising machine, identified as Mortising1, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(13) One (1) Voonwood shaper/sander, identified as ShapSand1, with a maximum capacity of 54.07 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(14) One (1) EMA planer, identified as Plane1, with a maximum capacity of 216.29 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(15) One (1) EMA shaper with a sliding table, identified as ShapSlid1, with a maximum capacity of 36.05 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(16) One (1) Dutch Mills double end tenoner, identified as DoubTenoner, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(17) One (1) Retter boring machine, identified as BorMach1, with a maximum capacity of 2.46 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(18) One (1) Watkin moulder, identified as Moulder1, with a maximum capacity of 270.36 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(19) One (1) OGM Gang-rip saw, identified as GangRipSw1, with a maximum capacity of 360.48 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(20) Three (3) miter saws, identified as:
- (a) One (1) DeWalt 12" miter saw, identified as MiterSw1, with a maximum capacity of 2.42 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (b) One (1) DeWalt 12" miter saw, identified as MiterSw2, with a maximum capacity of 3.60 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (c) One (1) Hitachi miter saw, identified as MiterSw3, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(21) Two (2) Groovers, identified as Groove1 and Groove2, with a maximum capacity of 7.21 pounds per hour for each unit, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(22) One (1) Delta Notcher, identified as Notch1, with a maximum capacity of 3.60 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

(23) One (1) Power-Matic band saw, identified as BandSw1, with a maximum capacity of 1.80 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) SSOA 039-9970-00505, issued on August 17, 1998; and

All conditions from previous approvals were incorporated into this permit except the following:

(1) SSOA 039-9970-00505, issued on August 17, 1998

Section A, No. 1: The combined total amount of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) delivered to the surface coating operations at the source shall not exceed fifteen (15) pounds per day.

Reason not incorporated: The source cannot comply with the limit in the SSOA, due to an increase in production at the source. Therefore, the SSOA is no longer valid.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on January 5, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 9-11).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	51.71
PM-10	51.71
SO_2	0
VOC	30.84
CO	0
NO_x	0

HAP's	**Potential To Emit (tons/year)**
single HAP	***less than 10***
Combined HAPs	***13.25***
TOTAL	***13.25***

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment

SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) The surface coating operations are not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63, Subpart JJ), because the source is not considered a "major" source pursuant to 40 CFR 63, Subpart A.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not a major source pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), because this source does not have the potential to emit greater than 250 tons per year of any criteria pollutant.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of PM and VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Woodworking

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the woodworking operations shall be limited to 5.66 pounds per hour when operating at a process weight rate of 1.62 tons per hour.

This limit was calculated by using the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The baghouse shall be in operation at all times the woodworking operations are in operation, in order to comply with this limit.

State Rule Applicability - Surface Coating

326 IAC 8-2-12 (Wood furniture and cabinet coating)

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets from all surface coating operations shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The source is in compliance because accepted applications are used.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the surface coating operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times the surface coating operations are in operation, in order to comply with this limit.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

(a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments. (See calculations page 11)

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name:	**Dutch Mills**
Address City IN Zip:	**1901 East Kercher Road, Goshen, Indiana 46526**
CP:	**039-10529-00505**
Plt ID:	**039-00505**
Reviewer:	**Kimberly Titzer**
Date:	March 1999

Material	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
SG8 stain	6.6	93.48%	0.0%	93.5%	0.0%	6.52%	0.00043	49.740	6.17	0.00	0.00	0.00	0.00	0.04	94.63	0%
SG9 topcoat	7.9	62.17%	0.0%	62.2%	0.0%	37.40%	0.00036	49.740	4.92	4.92	0.09	2.09	0.38	0.23	13.17	0%
SG10 topcoat	7.9	62.17%	0.0%	62.2%	0.0%	37.40%	0.00036	49.740	4.92	4.92	0.09	2.09	0.38	0.23	13.17	0%
SG11 topcoat	7.9	62.17%	0.0%	62.2%	0.0%	37.40%	0.00036	49.740	4.92	4.92	0.09	2.09	0.38	0.23	13.17	0%
SG12 topcoat	7.9	62.17%	0.0%	62.2%	0.0%	37.40%	0.00036	49.740	4.92	4.92	0.09	2.09	0.38	0.23	13.17	0%
SG13 stain	6.6	93.48%	0.0%	93.5%	0.0%	6.52%	0.00043	49.740	6.17	6.17	0.13	3.14	0.57	0.04	94.63	0%
SG14 stain	6.6	93.48%	0.0%	93.5%	0.0%	6.52%	0.00043	49.740	6.17	6.17	0.13	3.14	0.57	0.04	94.63	0%
SG15 stain	6.6	93.48%	0.0%	93.5%	0.0%	6.52%	0.00043	49.740	6.17	6.17	0.13	3.14	0.57	0.04	94.63	0%
SG16 stain	6.6	93.48%	0.0%	93.5%	0.0%	6.52%	0.00043	49.740	6.17	6.17	0.13	3.14	0.57	0.04	94.63	0%
SG17 stain	6.6	93.48%	0.0%	93.5%	0.0%	6.52%	0.00043	49.740	6.17	6.17	0.13	3.14	0.57	0.04	94.63	0%
State Potential Emissions			**Add worst case coating to all solvents**								**1.00**	**24.03**	**4.39**	**1.17**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Conclusion

The operation of this woodworking operation collocated with a surface coating operation shall be subject to the conditions of the attached proposed Minor Source Operating Permit 039-10529-00505.

Appendix A: Emissions Calculations
Particulate Matter
From Woodworking Operations

Based on the amount collected by the dust collector:

Amount of particulate matter collected (lbs/hr) = 96.6

Capture Efficiency of Dust Collector = 90%
Process Weight Rate (tons/hr) of all woodworking operations = 1.62

Dust Collector	Rate of Emissions After Controls (lbs/hr)	Allowable Emissions (lbs/hr) 326 IAC 6-3-2	Particulate Potential (tons/yr)
DC1	10.63	5.65	51.71

Methodology

Rate of Emissions After Controls = [Amount of sawdust collected][(1/efficiency)-1]
Particulate Potential (lbs/hr) = [Rate of Emissions after controls][(1/capture efficiency)]
Particulate Potential (tons/yr) = Particulate Potential(lbs/hr) x 8760(hrs/yr) x [1 ton/2000 lbs]
Allowable emissions (326 IAC 6-3-2)= 4.1 x process weight rate(tons/hr)

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name:	**Dutch Mills**
Address City IN Zip:	**1901 East Kercher Road, Goshen, Indiana 46526**
CP:	**039-10529-00505**
Plt ID:	**039-00505**
Reviewer:	**Kimberly Titzer**
Date:	March 1999

Material	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Booth 1																
stains	6.6	93.48%	0.0%	93.5%	0.0%	6.52%	0.00750	70.657	6.17	6.17	3.27	78.47	14.32	0.50	94.63	50%
Booth 2																
primer	9.3	41.67%	0.0%	41.7%	0.0%	36.84%	0.01030	141.314	3.87	3.87	5.63	135.23	24.68	17.27	10.51	50%
Booth 3																
varnish	9.3	48.22%	0.0%	48.2%	0.0%	35.89%	0.00700	141.314	4.50	4.50	4.46	106.92	19.51	10.48	12.55	50%
Booth 4																
topcoat	7.9	62.17%	0.0%	62.2%	0.0%	37.40%	0.00080	70.657	4.92	4.92	0.28	6.68	1.22	0.37	13.17	50%
Booth 5																
varnish	9.3	48.22%	0.0%	48.2%	0.0%	35.89%	0.00140	70.657	4.50	4.50	0.45	10.69	1.95	1.05	12.55	50%
State Potential Emissions			**Add worst case coating to all solvents**								**14.08**	**337.99**	**61.68**	**29.67**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name:	Dutch Mills
City, IN :	Goshen, Indiana
CP #:	039-10529-00505
Plt ID:	039-00505
Permit Reviewer:	Kimberly Titzer
Date:	March 1999

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl-Benzene	Weight % Formaldehyde	Weight % Xylene	Weight % Methanol	Weight % Methyl Iso-butyl Ketone
Booth 2								
(primer)	9.29	0.010300	141.31	0.00%	0.20%	2.00%	0.00%	10.00%
Booth 3								
(varnish)	9.34	0.007000	141.31	2.00%	1.00%	9.00%	0.00%	0.00%
Booth 4								
(topcoat)	7.92	0.000800	70.66	0.00%	0.15%	16.61%	18.00%	0.00%
Booth 5								
(varnish)	9.34	0.001400	70.66	2.00%	1.00%	9.00%	0.00%	0.00%

Total State Potential Emissions

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

HAP Emissions (cont'd)

Ethyl-Benzene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Xylene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)
0.00	0.12	1.18	0.00	5.92
0.81	0.40	3.64	0.00	0.00
0.00	0.00	0.33	0.35	0.00
0.08	0.04	0.36	0.00	0.00
0.89	**0.57**	**5.52**	**0.35**	**5.92**

HAP Emissions (cont'd):

Methyl Ethyl Ketone Emissions (ton/yr)	Ethyl-Benzene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Xylene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)
59.22	0.00	0.00	0.00	0.00	0.00
0.00	0.81	0.40	3.64	0.00	0.00
0.00	0.00	0.00	0.33	0.35	0.00
0.00	0.04	0.04	0.20	0.00	0.04
59.22	**0.85**	**0.45**	**4.17**	**0.35**	**0.04**